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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

William F. Lasky,

Plaintiff,

v.

Equifax Information Services, LLC;
Experian Information Solutions, Inc.;
JPMorgan Chase Bank, N.A.; Celtic
Bank Corporation dba Continental
Finance Company, LLC; North Shore
Bank, FSB; and Wells Fargo Bank,
N.A.,

Defendants.

Case No.: 2:23-cv-00825

**Unopposed Motion for an extension
of time for Celtic Bank Corporation
dba Continental Finance Company,
LLC to respond to Plaintiff's
complaint**

First request

William F. Lasky ("Plaintiff"), by and through counsel, hereby requests an extension of time for Celtic Bank Corporation dba Continental Finance Company, LLC ("Defendant") to respond to Plaintiff's complaint. Defendant's responsive pleading is currently due on June 29, 2023. This is the first request for an extension of this deadline.

1 The extension is sought because the parties are engaged in active
2 settlement discussions and informal discovery to assist the case resolution
3 efforts. Plaintiff does not oppose an extension of Defendant's time to answer
4 the complaint so that the parties may devote their energies to resolving this
5 matter.

6 In good faith and not for the purposes of delay, Plaintiff requests that this
7 Court extend Defendant's deadline to file its responsive pleading until on or
8 before **July 29, 2023**.

9 Dated: June 29, 2023.

10
11 **FREEDOM LAW FIRM, LLC**

12 /s/ Gerardo Avalos
13 George Haines, Esq.
14 Gerardo Avalos, Esq.
15 8985 S. Eastern Ave., Suite 100
16 Las Vegas, NV 89123
17 Attorneys for Plaintiff

18
19 IT IS SO ORDERED:

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22 UNITED STATES MAGISTRATE JUDGE

23 DATED: June 30, 2023
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